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**ISAACSON, ROSENBAUM, WOODS & LEVY, P.C.**

ATTORNEYS & COUNSELORS AT LAW

STANTON D. ROSENBAUM  
GARY A. WOODS  
SAMUEL L. LEVY  
STEVEN G. WRIGHT  
RICHARD D. GREENGARD  
EDWARD T. RAMEY  
WILLIAM M. SILBERSTEIN  
LAWRENCE J. DONOVAN, JR.  
GARY LOZOW  
LAWRENCE R. KUETER  
JONATHAN H. STEELER

SHELDON E. FRIEDMAN  
MARK G. GRUESKIN  
GARY A. KLEIMAN  
JON R. TANDLER  
BARRY PERMUT  
RICHARD M. PETKUN  
NEIL B. OBERFELD  
JOHN A. CHANIN  
THERESA L. CORRADA  
PAMELA A. JOHNSON  
BLAIN D. MYHRE

PAULA J. WILLIAMS  
STACEY STERN CHAPMAN  
ALISON T. DODSON  
LISA D. L. WILLIAMS  
DEREK C. WEST  
LISA R. BRENNER  
T. BARTON FRENCH, JR.  
RICHARD A. HARDAWAY  
BRADLEY A. BECK  
LISA C. WALTER  
BONNIE LARSON-de PAZ

KELLY ELEFANT  
CHRISTINE L. HAYES  
MATTHEW D. PLUSS

TIMOTHY P. DALY OF COUNSEL  
PAUL V. FRANKE SPECIAL COUNSEL  
SANDY GAIL NYHOLM OF COUNSEL

LOUIS G. ISAACSON (1910-1993)  
CHARLES ROSENBAUM (1901-1973)  
SAMUEL M. GOLDBERG (1903-1974)  
JOSEPH J. STOLLAR (1946-1984)

SENDER'S DIRECT DIAL  
(303) 256-3986

SENDER'S INTERNET ADDRESS  
jsteeler@irwl.com

November 26, 2001

**HAND DELIVER**

Ms. Dawn Tesorero  
Technical Enforcement Program  
U.S. Environmental Protection Agency  
Suite 300  
999 18th Street  
Denver, CO 80202-2466

Re: First Request for Information Pursuant to § 104 of CERCLA for the Vasquez  
Boulevard/I-70 Site, Denver, Colorado

Dear Ms. Tesorero:

On behalf of Pepsi Bottling Group ("PBG"), the attached is intended to supplement PBG's earlier responses to the above-referenced information request. On September 11, 2001, I forwarded on behalf of PBG a description of work at the PBG facility. This description outlines seven work areas. On September 11, 2001, I forwarded soil sampling results for Areas 1 and 2. On October 1, 2001, I forwarded soil sampling results for Area 4. On November 5, 2001, I forwarded soil sampling results for Areas 3 and 6 and certain utility trenches. On November 19, 2001, I forwarded soil sampling results for Area 7 and a Geotechnical Investigation of the soils underlying the area of the proposed storm water detention pond to be constructed in Area 7.

Responsive to question 9(h), attached hereto are a cover letter and soil sampling results for materials excavated from Area 3. Pursuant to earlier correspondence, this material will be disposed of at the DAD's landfill. Complete information regarding all disposal activities will be supplied at a later date.

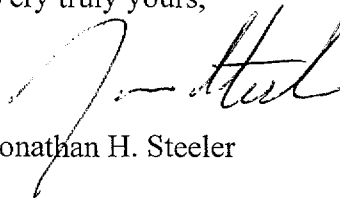
ISAACSON, ROSENBAUM, WOODS & LEVY, P.C.

November 26, 2001

Page 2

If you have any questions regarding this letter or need further information (including further certification), please advise the undersigned.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. Steeler".

Jonathan H. Steeler

JHS:jkw

Enclosure

509642

cc: David H. Patrick, Esq.  
Dennis H. Hunter, Ph.D.



November 19, 2001

RECEIVED NOV 23 2001

Gary Moser  
Waste Management  
2090 East 104<sup>th</sup> Avenue, #300  
Denver, CO 80233

**PBG Denver Soil Excavation**  
**3801 Brighton Boulevard**  
**ECG Project Number 00-128**

Dear Gary:

During the ongoing expansion/construction project at the Pepsi Bottling Group (PBG) facility, excavation activities discovered some darker colored material with construction debris. PBG halted excavation in this area in order to allow sampling of the materials. As has been our protocol, PBG analyzed the materials for total lead and total arsenic and TCLP lead and TCLP arsenic. The analytical results show these materials to be non-detectable for TCLP lead and arsenic and therefore, non hazardous. The analyses show that these materials are comparable to the waste stream already approved by Waste Management for the construction project. Therefore, PBG will dispose of these materials in the DADS landfill along with the previously approved waste stream.

If you have questions, please advise.

Very truly,  
ENVIRONMENTAL CONSULTING GROUP

Dennis H. Hunter, Ph.D.  
Certified Professional Environmental Assessor

Enclosure

cc D. Patton  
D. Patrick  
A. Smith  
T. Smith  
✓ J. Steeler

NOV-16-2001 12:53PM FROM-EVERGREEN ANALYTICAL

3034256021

T-010 P.002/002 F-053

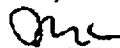
4036 Youngfield St., Wheat Ridge, CO 80033  
(303) 425-6021Client Sample ID : Debris Soil #1  
Lab Sample ID : 01-6162-01A  
Date Collected : 11/09/2001  
Date Received : 11/09/2001Client Project ID : PBG Debris Soil  
Lab Work Order : 01-6162  
Sample Matrix : Soil

Method: SW-6010		6010 METALS, SOIL & SOLIDS			
Date Prepared : 11/14/2001	Lab File ID : 1115PM	Effective Dilution : 1			
Date Analyzed : 11/15/2001	Method Blank : MB-10567				
Compound Name	CAS Number	Concentration	RL	Units	
Arsenic	7440-38-2	11	8.1	mg/Kg	
Lead	7439-92-1	220	5.6	mg/Kg	

## Qualifiers:

- U - Not Detected at the Reporting Limit (RL)
- T - Analyte detected below Practical Quantitation Limit (PQL)
- E - Extrapolated value. See screen at dilution.
- S - Spike Recovery outside accepted recovery limits

- B - Analyte detected in the associated Method Blank. This value was not subtracted from the sample result.
- \* - Value exceeds maximum contamination limit (MCL)
- R - Dilution Test RPD > 10% indicates possible interference.



Analyst



Approved

11/16/2001 12:25 PM

NOV-14-2001 02:45PM FROM-EVERGREEN ANALYTICAL

3034256021

T-830 P.003/003 F-347

4036 Youngfield St., Wheat Ridge, CO 80033  
(303) 425-6021

Client Sample ID : Debris Soil #1

Lab Sample ID : 01-6162-01B

Date Collected : 11/09/2001

Date Received : 11/09/2001

Client Project ID : PBG Debris Soil

Lab Work Order : 01-6162

Sample Matrix : Soil

Method: SW-6010

TCLP METALS

Date Prepared : 11/12/2001

Lab File ID : 1113PM

Effective Dilution : 1

Date Analyzed : 11/13/2001

Method Blank : MB-10540

Compound Name	CAS Number	Concentration	RL	Units
Arsenic	7440-38-2	U	0.5	mg/L
Lead	7439-92-1	U	0.5	mg/L

Qualifiers: U - Not Detected at the Reporting Limit (RL)  
J - Analyte detected below Practical Quantitation Limit (PQL)  
E - Extrapolated value. See curve at dilution  
S - Spike Recovery outside accepted recovery limits

B - Analyte detected in the associated Method Blank. This value was not subtracted from the sample result.  
\* - Value exceeds maximum contamination limit (MCL)  
R - Dilution Test RPD > 10% indicates possible interference.

Analyst

Approved

11/14/2001 1:00 PM